

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

WILLIAM J. MURRAY,

Plaintiff,

v.

TXU CORP., et al.

Defendants.

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U.S. DISTRICT COURT  
DISTRICT OF MASS.  
CASE NO. 04-CV-12123NG

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**MOTION FOR ADMISSION PRO HAC VICE OF ROBERT K. WISE**

Anita B. Bapooji, an associate with the law firm of Testa, Hurwitz & Thibault, LLP, and a member in good standing of the bar of this Court, respectfully requests that this Court, pursuant to Local Rule 83.5.3, enter an Order authorizing Robert K. Wise of Hunton & Williams LLP to appear pro hac vice in the above-captioned case on behalf of defendants TXU Corp., TXU Energy Company LLC and TXU Portfolio Management Company LP, f/k/a TXU Energy Trading Company LP for the following reasons:

- (1) TXU Corp., TXU Energy Company LLC and TXU Portfolio Management Company LP, f/k/a TXU Energy Trading Company LP are defendants in the above-captioned matter;
- (2) TXU Corp., TXU Energy Company LLC and TXU Portfolio Management Company LP, f/k/a TXU Energy Trading Company LP have retained Hunton & Williams LLP to represent their interests in this proceeding and Robert K. Wise is one of their attorneys;
- (3) Mr. Wise has prepared a certificate in accordance with Local Rule 83.5.3, attached hereto, certifying that:

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(a) He is a member in good standing of the bar of the highest court of Texas, the United States District Court for the Northern District of Texas and the Fifth Circuit Court of Appeals;

(b) He is familiar with the facts surrounding this dispute and the Local Rules of the United States District Court for the District of Massachusetts; and

(c) There are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction.

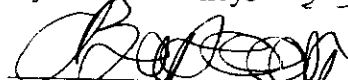
WHEREFORE, I respectfully request that this Court enter an Order authorizing the admission pro hac vice of Robert K. Wise.

Dated: October 26, 2004

Respectfully submitted,

**TXU CORP., TXU ENERGY COMPANY  
LLC, AND TXU PORTFOLIO  
MANAGEMENT COMPANY, LP, F/K/A  
TXU ENERGY TRADING COMPANY LP**

By Their Attorneys



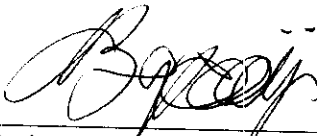
Anita B. Bapooji (BBO #644657)  
TESTA, HURWITZ & THIBEAULT, LLP  
125 High Street  
Boston, MA 02110  
(617) 248-7000

Counsel for Defendants

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**CERTIFICATION UNDER LOCAL RULE 7.1(A)(2)**

I, Anita B. Bapooji, Esq. have spoken with counsel for ANP, Christopher M. Carter, Esq., of the law firm Hinkley, Allen & Snyder, LLP, and he has indicated that he assents to this motion.

  
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Anita B. Bapooji